

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

COMES NOW, Plaintiff, Belinda Saunders, pursuant to FED. R. CIV. P. 26,
Plaintiff designates and discloses the following persons as a possible expert
witness/potential witnesses/exhibits at trial to present evidence under Rule 702, 703 or
705 of the Federal Rules of:

I.

EXPERT WITNESS

A

Plaintiff may call to testify the following retained expert witness at the trial of this cause to present expert opinion testimony at trial based upon his work experience, training, and

specialized knowledge.

Edwin Johansson
2245 Keller Way
Suite 320
Carrollton, TX 75006
Ph (972) 820-0342
Fx (214) 367-3930

Mr. Johansson is a Credit Analyst for the Escher Group: CEO, President of the Escher Group and President of Credit Security Group. Johansson consults and lectures with consumers as well as bank loan officers on the principles and concepts of credit reporting and FICO scoring. He educates his clients, on a daily basis, the primary reasons credit scores rise and fall. He advises them on the benefits as well as consequences of their actions in assisting them to increase their credit scores and lending power. Mr. Johansson gives frequent lectures on rapid rescoring to bank loan officers and well as bank vice presidents. Mr. Johansson has been on several local news networks discussing credit scoring issues. He has appeared on Fox 4, WFAA 8, CBS 11 as well as ABC News Radio discussing credit and reporting issues. Mr. Johansson also has been feature in several news articles including forbes.com titled, *How to raise your credit score*.

Prior to Credit Security Group, Mr. Johansson worked as a credit analyst for i3 Solution from 2001 to 2003. Mr. Johansson has made it his professional career to study and focus on the science of how FICO scores are created and react to outside influences causing them to rise and fall.

B.

Mr. Johansson will be testifying to his opinions contained in his expert report directly regarding the allegations in the complaint, including but not limited to Equifax's

inconsistent reporting of authorized user accounts.

II.

Plaintiff further reserves the right to elicit opinions and expert testimony from all persons listed as having knowledge of relevant facts, as to either the liability or damage issues in this case, who are designated by the Defendant as well as the Plaintiff. If any fact witness is qualified to express an opinion relevant to this case, Plaintiff reserves the right to elicit that opinion, although the designated fact witness may have been specifically retained as an expert by a party in this case.

III

Plaintiff also designates each and every expert who will be designated by each party to this litigation. Plaintiff also reserves the right to call Defendant as well as all of Defendant's fact or expert witnesses as his own hostile witness regarding the facts, liability and damages of this case.

IV.

Plaintiff further reserves the right to elicit expert testimony from expert witnesses and fact witnesses later identified and discovered by any and all parties hereto, preserving the right to supplement this designation as additional discovery is conducted or as additional issues requiring expert testimony may arise.

V.

Furthermore, Plaintiff reserves the right to call rebuttal expert witnesses or fact witnesses. The need for their testimony cannot be anticipated at this time. Therefore, the subject matter of their testimony cannot be anticipated at this time.

VI.

EXHIBITS

1. Plaintiff's dispute letter to Equifax dated January 28, 2016
2. Equifax's results to Plaintiff's dispute dated February 8, 2016
3. CSG's agreement
4. Medical documentation reflecting Plaintiff's shingles diagnosis

Plaintiff will use all documents, records or files, as well as any tangible items that were produced and exchanged during the discovery process which is still currently open.

Plaintiff reserves the right to amend and/or supplement the exhibit list if further exhibits will be needed or required for trial.

VII.

POTENTIAL FACT WITNESSES

Belinda Saunders
c/o Dennis McCarty
McCarty Law Firm
MS Bar No. 102733
P.O. Box 111070
Carrollton, TX 75011
(817) 704-3375

Plaintiff has knowledge of the allegations and claimed damages set forth in the complaint

Michael W. Saunders
c/o Dennis McCarty
McCarty Law Firm
MS Bar No. 102733
P.O. Box 111070
Carrollton, TX 75011
(817) 704-3375

Mr. Saunders has knowledge of the allegations and claimed damages set forth in the complaint

PA, Joshua Embry, Lone Star Dermatology, 1401 Medical Pkwy. #300, Cedar Park, Tx 78613. (512) 260-5860

Dates of Service were January 26, 2016 and February 2, 2016.

Has knowledge of Plaintiff's shingles.

Any Manager, Executive or employee (current or past) of Defendant that has any knowledge of any fact of this case, either known or unknown at this time. Parties are still in the discovery process.

Unknown Potential Witnesses will be discovered by the discovery process or in any natural progression of discovery of the Plaintiff.

Plaintiff reserves the right to amend and/or supplement potential witness as they are discovered and will provide notice to Defendant of their discovery.

Plaintiff's potential witness will testify to all of the damages and facts of the case as alleged within the complaint, including but not limited to the Defendant reporting false and inaccurate information on Plaintiff's credit report and the status of the alleged account.

IIX.

EXPERT WITNESS' TO ATTORNEYS FEES

Plaintiff's reasonable attorneys fees are determined by this Honorable Court upon a successful action pursuant to 15 U.S.C. §1681n and 15 U.S.C. §1681o. Even though experts for attorneys fees are not required, however, Plaintiff will call any and all attorneys as needed to testify as to the reasonableness of attorneys fees that include but not limited to:

Dennis McCarty,
P.O. Box 111070
Carrollton, Texas
Telephone: 817-704-3375

Facsimile: 817-887-5069

And;

Jonathan Forrest Raburn
THE RABURN LAW FIRM, LLC
333 Texas Street
Suite 1300
Shreveport, LA 71101
318-918-1968 phone
318-230-7036 fax
Email: jonathan@geauxlaw.com

Respectfully submitted,

/s/ Dennis McCarty
DENNIS MCCARTY
MS Bar# 102733
Attorney for Plaintiff
P.O. Box 111070
Carrollton, Tx 75011
Phone: 817-704-3375
Fax: 817-887-5069

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of April, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the attorneys on record:

Date Signed this the 24th day of April, 2017

/s/ Dennis McCarty
DENNIS MCCARTY
MS Bar# 102733
Attorney for Plaintiff
P.O. Box 111070
Carrollton, Tx 75011
Phone: 817-704-3375
Fax: 817-887-5069